# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

#### **CASE NO. <u>23-20454-CR-BECERRA</u>**

#### UNITED STATES OF AMERICA

VS.

CARL ALAN ZAGLIN, ALDO NESTOR MARCHENA, FRANCISCO ROBERTO COSENZA CENTENO,

Defendants.	

## DEFENDANT ZAGLIN'S EXHIBIT LIST

Defendant Carl Alan Zaglin respectfully files this Exhibit List, showing the Court and the United States the documents which Defendant may seek to introduce into evidence during the trial in this action. Defendant expressly reserves the right to mark additional documents, not listed herein, for purposes of cross-examination, to be numbered beginning D300.

Exhibit No.	Description	Bates Range / Other Source	Date Identified	Date Admitted
D1	Email string with subject "Panama document Sign"	DOJ_SDFL_0000287336		
D2	Email string with the subject "Guatemala"	DOJ_SDFL_0000051674		
D3	Handwritten notes	DOJ_SDFL_0002995864- DOJ_SDFL_0002996045		
D4	Email with subject "HN POLICE" and attachment	DOJ_SDFL_0000999051- DOJ_SDFL_0000999052		
D5	Email string with the subject "Ruben contact info"	DOJ_SDFL_0000213036- DOJ_SDFL_0000213037		
D6	Email string with the subject "Marel"	DOJ_SDFL_0003106209- DOJ_SDFL_0003106210		
D7	Email with the subject "Honduras contract"	DOJ_SDFL_0000213013		
D8	Email string with the subject "Honduras contract"	DOJ_SDFL_0000213006- DOJ_SDFL_0000213007		

D9	Email string with the subject "Proposal"	DOJ_SDFL_0000212996- DOJ_SDFL_0000212997	
D10	Email string with the subject "Proposal"	DOJ_SDFL_0000213884- DOJ_SDFL_0000213886	
D11	Email string with the subject "Proposal"	DOJ_SDFL_0000212988- DOJ_SDFL_0000212990	
D12	Email string with the subject "Proposal"	DOJ_SDFL_0000212985- DOJ_SDFL_0000212987	
D13	Email string with the subject "Emailing: Copy of Honduras national police 3-30-15" and attachment	DOJ_SDFL_0000996803- DOJ_SDFL_0000996804	
D14	Email with the subject "Honduran Contract – FY16"	DOJ_SDFL_0000404984- DOJ_SDFL_0000404985	
D15	Email with the subject "TPG & Atlanco Meeting Notes"	DOJ_SDFL_0000214134- DOJ_SDFL_0000214135	
D16	Email string with the subject "TPG & Atlanco Meeting Notes"	DOJ_SDFL_0000212983- DOJ_SDFL_0000212984	
D17	Email with the subject "Honduran Contract - FY16"	DOJ_SDFL_0000212975	
D18	Email string with the subject "Honduran Contract - FY16"	DOJ_SDFL_0000212973- DOJ_SDFL_0000212974	
D19	Email string with the subject "Conference Cail Follow Up" and attachment	DOJ_SDFL_0000051966- DOJ_SDFL_0000051967	
D20	Email string with the subject "Conference Call Follow Up" and attachment	DOJ_SDFL_0000987215	
D21	Email string with the subject "Honduran Contract - FY16"	DOJ_SDFL_0000212942- DOJ_SDFL_0000212943	
D22	Email string with the subject "Honduras National Police meeting"	DOJ_SDFL_0000999492	
D23	Email with the subject "Honduras Uniform Meeting AAR" and attachments	DOJ_SDFL_0000212928- DOJ_SDFL_0000212937	
D24	Email with the subject "BD TPG Honduras Project 5-1-2015.xlsx"and attachment	DOJ_SDFL_0000994087- DOJ_SDFL_0000994088	

D25	Email with the subject "HN	DOJ_SDFL_0003106211-	
	Flow Chart" and attachment	DOJ_SDFL_0003106212	
D26	Email string with the	CZ01336-CZ01337	
	subject "Honduras		
	Contract"		
D27	Email string with the	DOJ_SDFL_0000212924	
	subject "Honduras		
	payments"		
D28	Email with the subject	DOJ_SDFL_0003106213	
	"Please review"		
D29	Email string with the	DOJ_SDFL_0003106214	
	subject "Please review"		
D30	Email string with the	DOJ_SDFL_0003106215	
	subject "Please review"		
D31	Email with the subject	DOJ_SDFL_0003106217-	
	"Contract re: Honduran	DOJ_SDFL_0003106219	
	Government" and		
	attachment		
D32	Email string with the	DOJ_SDFL_0001837208-	
	subject "Contract re:	DOJ_SDFL_0001837211	
	Honduran Government"		
	and attachment		
D33	Email string with the	DOJ_SDFL_0001837187-	
	subject "Conference Call	DOJ_SDFL_0001837188	
	Follow Up" and attachment		
D34	Email string with the	DOJ_SDFL_0000986546	
	subject "Honduras"		
D35	Email string with the	DOJ_SDFL_0001837148-	
	subject "Conference Call	DOJ_SDFL_0001837149	
	Follow Up"		
D36	Email string with the	DOJ_SDFL_0000212885	
	subject "Final Numbers"		
D37	Email string with the	DOJ_SDFL_0000212882-	
	subject "Honduras"	DOJ SDFL 0000212884	
D38	Email string with the	DOJ_SDFL_0000212881	
_	subject "Honduras"		
D39	Email string with the	CZ01350-CZ01352	
	subject "Contract re		
	Honduran Government"	DOY ODDY ORGANIZATION	
D40	Email string with the	DOJ_SDFL_0003106226-	
	subject "Contract re:	DOJ_SDFL_0003106228	
	Honduran Government"	DOL GDEL 000010100	
D41	Email string with the	DOJ_SDFL_0003106229-	
	subject "Jaime's info"	DOJ_SDFL_0003106230	

D42	Email string with the subject "Bank account in HN"	DOJ_SDFL_0000212855- DOJ_SDFL_0000212856	
D43	Email with the subject "Contract re: Honduran Government"	DOJ_SDFL_0001837061- DOJ_SDFL_0001837063	
D44	Email string with the subject "Contract re: Honduran Government"	DOJ_SDFL_0003106233- DOJ_SDFL_0003106237	
D45	Email with the subject "Honduras Trip"	DOJ_SDFL_0000404873	
D46	Email string with the subject "Honduras Trip"	DOJ_SDFL_0000404893- DOJ_SDFL_0000404894	
D47	Email with subject "Honduras contract"	CZ01394	
D48	Email string with the subject "Honduras Contract"	DOJ_SDFL_0003106238- DOJ_SDFL_0003106239	
D49	Email with the subject "Honduras Contract"	DOJ_SDFL_0000983909	
D50	Email string with the subject "Contract re Honduran Government"	DOJ_SDFL_0003106240- DOJ_SDFL_0003106243	
D51	Email string with the subject Honduras Contract" and attachments	CZ00052-CZ00073	
D52	Email string with the subject Honduras Contract" and attachment	DOJ_SDFL_0003106271- DOJ_SDFL_0003106277	
D53	Email string with the subject Honduras Contract"	DOJ_SDFL_0000986295- DOJ_SDFL_0000986296	
D54	Email string with the subject Honduras Contract"	DOJ_SDFL_0003106278- DOJ_SDFL_0003106283	
D55	Email string with the subject Honduras Contract"	DOJ_SDFL_0003106284- DOJ_SDFL_0003106290	
D56	Email with the subject "Honduras Contract" and attachment	DOJ_SDFL_0000988716- DOJ_SDFL_0000988717	
D57	Email string with the subject "Honduras Contract"	CZ01428-CZ01434	
D58	Email string with the subject "Honduras Contract"	CZ01435-CZ01442	
D59	Email string with the subject Honduras Contract"	DOJ_SDFL_0003106292- DOJ_SDFL_0003106295	

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D60	Email string with the	DOJ_SDFL_0003106296-	
	subject Honduras Contract"	DOJ_SDFL_0003106303	
D61	Email string with the	DOJ_SDFL_0000212842-	
	subject "Atlanco-TPG	DOJ_SDFL_0000212844	
	Honduras Payment		
	Waterfall – 6.19.xlsx" and		
	attachment		
D62	Email string with the	DOJ_SDFL_0003106304-	
	subject "Honduras	DOJ_SDFL_0003106311	
	Contract"		
D63	Email string with the	DOJ_SDFL_0000983509-	
	subject "Atlanco-TPG	DOJ_SDFL_0000983510	
	Honduras Payment		
	Waterfall – 6.19.xlsx"		
D64	Email string with the	DOJ_SDFL_0001837375	
	subject "Atlanco-TPG		
	Honduras Payment		
	Waterfall – 6.19.xlsx"		
D65	Email string with the	DOJ_SDFL_0003106312-	
	subject "Atlanco-TPG	DOJ_SDFL_0003106314	
	Honduras Payment		
	Waterfall – 6.19.xlsx"		
D66	Email string with the	DOJ_SDFL_0000212839-	
	subject "Atlanco-TPG	DOJ_SDFL_0000212839	
	Honduras Payment		
D. ( =	Waterfall – 6.19.xlsx"	DOX CDTY 000001001	
D67	Email string with the	DOJ_SDFL_0000212855-	
	subject "Bank account in	DOJ_SDFL_0000212856	
7.00	HN"	DOX 6000	
D68	Email with the subject	DOJ_SDFL_0000994009	
7.00	"Bond Questions"	DOX 2007	
D69	Email string with the	DOJ_SDFL_0000213844	
<b>D</b> =0	subject "Congrats"	DOL GDEY 0000101011	
D70	Email string with the	DOJ_SDFL_0003106343-	
	subject "Honduras:	DOJ_SDFL_0003106345	
	National Police Contract		
	and Annex"		
D71	Email string with the	DOJ_SDFL_0000212810	
	subject "Contract Signing"		
D72	Email string with the	DOJ_SDFL_0003106346-	
	subject "Contract	DOJ_SDFL_0003106347	
	Questions"		
D73	Email string with the	DOJ_SDFL_0000212825-	
	subject "Honduras	DOJ_SDFL_0000212826	
	Statement" and attachment		

D74	Email string with the subject "Honduras Statement"	DOJ_SDFL_0000212804
D75	Email string with the subject "Honduras Statement"	DOJ_SDFL_0000993435- DOJ_SDFL_0000993438
D76	Email string with the subject "Bank Bonds"	DOJ_SDFL_0000289641
D77	Email string with the subject "Honduras Statement"	DOJ_SDFL_0000992170- DOJ_SDFL_0000992173
D78	Email string with the subject "Honduras Statement"	DOJ_SDFL_0000287043- DOJ_SDFL_0000287046
D79	Email with the subject "Atlanco/TPG Revised Waterfall" and attachment	DOJ_SDFL_0001837102- DOJ_SDFL_0001837104
D80	Email string with the subject "Atlanco/TPG Revised Waterfall" and attachment	DOJ_SDFL_0001837494- DOJ_SDFL_0001837497
D81	Email string with the subject "Atlanco/TPG Revised Waterfall"	DOJ_SDFL_0003106348- DOJ_SDFL_0003106349
D82	Email string with the subject "Honduras National Police/TASA Contract"	DOJ_SDFL_0003106351- DOJ_SDFL_0003106353
D83	Email string with the subject "HNP Contract Payment"	DOJ_SDFL_0000212799- DOJ_SDFL_0000212800
D84	Email string with the subject "HNP Contract Payment"	DOJ_SDFL_0000212797- DOJ_SDFL_0000212798
D85	Email with the subject "PROFF RECEIPT BANK GUARANTEE" and attachment.	DOJ_SDFL_0003106354- DOJ_SDFL_0003106355
D86	Email with the subject "Tasa HN.	DOJ_SDFL_0000982318
D87	Email with the subject "NEW CONTRACT – URGENT" and attachments	DOJ_SDFL_0000212787- DOJ_SDFL_0000212788
D88	Email string with the subject "NEW CONTRACT – URGENT"	DOJ_SDFL_0000212792- DOJ_SDFL_0000212794

D89	Email string with the subject "NEW CONTRACT – URGENT" and attachments	DOJ_SDFL_0000212944- DOJ_SDFL_0000212944	
D90	Email with the subject "NEW CONTRACT – URGENT"	DOJ_SDFL_0003106356- DOJ_SDFL_0003106359	
D91	Email with the subject "NEW CONTRACT – URGENT"	DOJ_SDFL_0000212777- DOJ_SDFL_0000212780	
D92	Email with the subject "Honduran Contract (Small) docs" and attachment	DOJ_SDFL_0000212781- DOJ_SDFL_0000212782	
D93	Email string with the subject "Honduran Contract (Small) docs"	DOJ_SDFL_0003106363- DOJ_SDFL_0003106364	
D94	Email with the subject "TASA - Bonds" and attachment	DOJ_SDFL_0000988929	
D95	Email with the subject "TASA - Bonds"	DOJ_SDFL_0000982569	
D96	Email string with the subject "Revised Bond" and attachment	DOJ_SDFL_0003106383- DOJ_SDFL_0003106385	
D97	Wire Transfer Request form	DOJ SDFL 0000051657	
D98	Wells Fargo wire transfer information	DOJ_SDFL_0000051657	
D99	Email string with the subject "Trademark Registrations - Urgent"	DOJ_SDFL_0000286930- DOJ_SDFL_0000286932	
D100	Email string with the subject "Modificaciones al Contrato"	CZ01583-CZ01585	
D101	Email string with the subject "Addendum to ATLANCO LLC Contract"	DOJ_SDFL_0003106388	
D102	Email string with the subject "Adenda a Contrato ATLANCO LLC"	DOJ_SDFL_0000285248- DOJ_SDFL_0000285250	
D103	Email with the subject "Adenda a Contrato ATLANCO LLC"	DOJ_SDFL_0001837169	
D104	Email string with the subject "Honduras Updater"	DOJ_SDFL_0001837774	

D105	Email with the subject "Bryan Berkman"	DOJ_SDFL_0000212747	
D106	Email with the subject "Bryan Berkman"	DOJ_SDFL_0000218754	
D107	Email string with the subject "Bryan Berkman"	DOJ_SDFL_0000219433	
D108	Email with subject "http://achievecap.com/"	DOJ_SDFL_0001158261	
D109	Email with the subject "This is something that Scott printed for me to review" and attachment	DOJ_SDFL_0003106393- DOJ_SDFL_0003106403	
D110	Email with the subject "Here is a link"	DOJ_SDFL_0003106404	
D111	Email with the subject "Question"	DOJ_SDFL_0003106406	
D112	Email string with the subject "Question"	DOJ_SDFL_0003106408	
D113	Email with the subject "Mica dos your database include any information about"	DOJ_SDFL_0003106411	
D114	Email string with the subject "while I am waiting for the library guy" and attachment	DOJ_SDFL_0003106412- DOJ_SDFL_0003106419	
D115	Email string with the subject "Achieve Capital – AML Policy" and attachment	DOJ_SDFL_0000993670- DOJ_SDFL_0000993732	
D116	Email string with the subject "Achieve Capital – AML Policy" and attachment	DOJ_SDFL_0000054316- DOJ_SDFL_0000054378	
D117	Email string with the subject "From James Kane in the Atlanta Office 9-2-15" and attachments	DOJ_SDFL_0003106420- DOJ_SDFL_0003106486	
D118	Email string with the subject "FCPA Questions" and attachments	DOJ_SDFL_0003106495- DOJ_SDFL_0003106560	
D119	Email string with the subject "FCPA Questions" and attachments	CZ02755-CZ02820	
D120	Handwritten notes	DOJ_SDFL_0003107512- DOJ_SDFL_0003107515	

D121	Email with the subject "Here is Jim Eisenhower's	DOJ_SDFL_0003106562	
	email address"		
D122	Email string with the subject "Atlanco – Honduras contract review" and attachments	CZ02821- CZ02843	
D123	Email string with the subject "Atlanco – Honduras contract review"	DOJ_SDFL_0003106565- DOJ_SDFL_0003106567	
D124	Email string with the subject "Here is Jim Eisenhower's email address"	DOJ_SDFL_0003106571- DOJ_SDFL_0003106572	
D125	Email string with the subject" James Eisenhower – Contact Information" and attachment	CZ01691-CZ01692	
D126	Email string with the subject "Honduras National Police"	DOJ_SDFL_0000213499- DOJ_SDFL_0000213502	
D127	Email string with the subject "Atlanco – Honduras contract review"	DOJ_SDFL_0003106573- DOJ_SDFL_0003106575	
D128	Email with the subject "Scott"	DOJ_SDFL_0003106577	
D129	Email string with the subject "Atlanco – Honduras contract review" and attachment	DOJ_SDFL_0003106578- DOJ_SDFL_0003106578	
D130	Email string with the subject "Atlanco – Honduras contract review" and attachments	DOJ_SDFL_0003106597- DOJ_SDFL_0003106634	
D131	Email string with the subject "Soicitud factura proforma"	DOJ_SDFL_0000213503- DOJ_SDFL_0000213507	
D132	Email with the subject "Meeting in Miami"	DOJ_SDFL_0000212267	
D133	Email string with the subject "Meeting in Miami"	DOJ_SDFL_0000212488- DOJ_SDFL_0000212489	
D134	Email string with the subject "Atlanco - Honduras contract review" and attachment	DOJ_SDFL_0000762170- DOJ_SDFL_0000762176	

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D135	$\mathcal{E}$	DOJ SDFL 0003106654-	
	subject "Atlanco –	DOJ SDFL 0003106660	
	Honduras contract review"		
D136	Email string with the	DOJ SDFL 0003106661-	
	subject "Atlanco –	DOJ SDFL 0003106667	
	Honduras contract review"		
D137	Email string with the	DOJ SDFL 0003106668-	
	subject "Atlanco –	DOJ SDFL 0003106675	
	Honduras contract review"		
D138	Email string with the	DOJ SDFL 0003106676-	
	subject "Atlanco –	DOJ SDFL 0003106683	
	Honduras contract review"		
D139	Email string with the	DOJ_SDFL_0000288717	
	subject "update"		
D140	Email with the subject	DOJ SDFL 0003106686-	
	"General Information" and	DOJ SDFL 0003106747	
	attachment		
D141	Email string with the	DOJ SDFL 0003106749	
	subject "General		
	Information" and		
	attachment		
D142	Email string with the	DOJ SDFL 0000762133	
	subject "Meeting in Miami"		
D143	Email string with the	DOJ SDFL 0000212274	
	subject "Meeting in Miami"		
D144	Email string with the	DOJ SDFL 0003107509	
	subject "update"		
D145	Email string with the	DOJ SDFL 0003106752-	
	subject "Atlanco –	DOJ SDFL 0003106759	
	Honduras contract review"		
D146	Email string with the	CZ02844- CZ02861	
	subject "Atlanco –		
	Honduras contract review"		
	and attachment		
D147	Email string with the	DOJ SDFL 0003106769-	
	subject "Atlanco –	DOJ SDFL 0003106799	
	Honduras contract review"		
	and attachment		
D148	Email string with the	DOJ SDFL 0000762131	
	subject "Meeting in Miami"		
D149	Email string with the	DOJ SDFL 0000762129	
	subject "Meeting in Miami"		
D150	Email string with the	DOJ SDFL 0000212490-	
2100	S	DOJ SDFL 0000212492	
	subject "Meeting in Miami"	DOJ SDFL 0000212492	

D151	T 11 . 1 . 1 . 1	DOI GDEL 0000212202	
D151	$\mathcal{E}$	DOJ_SDFL_0000212303-	
	"Achieve GEA - Broker	DOJ_SDFL_0000212307	
	Agreement" and attachment		
D152	Email string with subject	DOJ_SDFL_0003106802-	
	"Broker Agreement	DOJ_SDFL_0003106804	
	Achieve GEA Draft		
	09.17.2015-JMK-first		
	Version.docx" and		
	attachment		
D153	Email string with subject	DOJ SDFL 0000212475	
	"Achieve GEA - Broker		
	Agreement"		
D154	Email string with subject	DOJ SDFL 0003106805	
	"Broker Agreement		
	Achieve GEA Draft		
	09.17.2015-JMK-first		
	Version.docx"		
D155	Email string with subject	DOJ_SDFL_0003106806	
	"Broker Agreement		
	Achieve GEA Draft		
	09.17.2015-JMK-first		
	Version.docx"		
D156	Email with subject	DOJ SDFL 0003106807	
2100	"Contract"	2 30_2212_336133337	
D157	Email with the subject	DOJ SDFL 0001838840-	
	"Draft Memorandum +	DOJ_SDFL_0001838842	
	Latest Waterfall" and		
	attachments		
D158	Email string with the	DOJ SDFL 0000407815-	
<b>D</b> 130	subject "Draft	DOJ SDFL 0000407819	
	Memorandum + Latest	DO3_SD1E_0000 107017	
	Waterfall" and attachments		
D159	Email string with the	DOJ SDFL 0001836581-	
	subject "here is the draft we	DOJ_SDFL_0001836583	
	discussed based on what	DOJ_SDI E_0001630363	
	you and I have discussed"		
	and attachment		
D160	Email with the subject "09-	CZ01332-CZ01335	
וועם	21-2015 Broker Agreement	CL01332-CL01333	
	Achieve GEA Draft.docx"		
	and attachment		
D161		DOI CDEL 0002104909	
D161	Email string with the	DOJ_SDFL_0003106808	
	subject "09-21-2015 Broker		
	Agreement Achieve GEA		
	Draft.docx"		

D162	Email string with the subject "09-21-2015 Broker Agreement Achieve GEA Draft.docx" and attachments	CZ02862-CZ02865	
D163	Email string with the subject "09-21-2015 Broker Agreement Achieve GEA Draft.docx"	DOJ_SDFL_0003106810	
D164	Email with the subject "09- 21-2015 Broker Agreement Achieve GEA Draft (3)" and attachment	CZ02866-CZ02868	
D165	Email with the subject "here is the draft we discussed based on what you and I have discussed" and attachment	CZ02869-CZ02871	
D166	Email string with the subject "here is the draft we discussed based on what you and I have discussed"	DOJ_SDFL_0000288491- DOJ_SDFL_0000288492	
D167	Email with the subject "Philadelphia"	DOJ_SDFL_0003106829	
D168	Email with the subject "Philadelphia"	DOJ_SDFL_0003106830	
D169	Email with the subject "Atlanco"	DOJ_SDFL_0003106831	
D170	Email string with the subject "Philadelphia"	DOJ_SDFL_0003106832	
D171	Email with the subject "Contract"	DOJ_SDFL_0000051713	
D172	Email with the subject "Atlanco-TPG Honduras Payment Waterfall - 8.14.15.xlsx" and attachment	DOJ_SDFL_0001837776- DOJ_SDFL_0001837777	
D173	Email string with subject "Contract"	DOJ_SDFL_0003106833	
D174	Email string with subject "Contract"	DOJ_SDFL_0003106834- DOJ_SDFL_0003106835	
D175	Email string with the subject" here is the draft we discussed based on what you and I have discussed" and attachments	CZ01704	

D176	Email string with subject	DOI SDEL 0002106020	
D1/0	Email string with subject "here is the draft we	DOJ_SDFL_0003106838- DOJ_SDFL_0003106839	
	discussed based on what	DOJ_SDFL_0003100839	
	you and I have discussed"		
D177	Email string with subject	CZ02872- CZ02875	
DITT	"09-21-2015 Broker	CZ02872- CZ02873	
	Agreement Achieve GEA		
	Draft (3)"		
D178	Email with the subject	DOJ SDFL 0003106840-	
D170	"Broker agreement 10-6-	DOJ_SDFL_0003106842	
	15.pdf' and attachment	Des_SD1 E_00031000 12	
D179	Email string with the	CZ02876-CZ02879	
Ditt	subject "Broker agreement	C202070 C202079	
	10-6-15 Word file" and		
	attachments		
D180	Email string with the	CZ02880-CZ02883	
	subject "Broker agreement		
	10-6-15 Word file" and		
	attachments		
D181	Email with the subject	DOJ_SDFL_0003106849-	
	"Corrected pdf Broker	DOJ_SDFL_0003106851	
	Agreement from Kane 10-		
	6-15 pdf' and attachment		
D182	Email with subject	DOJ_SDFL_0000212320-	
	"10.06.2015 Agreement	DOJ_SDFL_0000212322	
	Final. Docx" and		
	attachment		
D183	Email string with subject	DOJ_SDFL_0003106855	
	"10.06.2015 Agreement		
D101	Final. Docx"	DOLGDEL 200212625	
D184	Email with subject "FINAL	DOJ_SDFL_0003106856-	
	CORRECTED 10.06.2015	DOJ_SDFL_0003106858	
	Agreement Final" and		
D105	attachment  Email with subject	DOI SDEL 0002106962	
D185	Email with subject "Corrected Broker	DOJ_SDFL_0003106863-	
		DOJ_SDFL_0003106865	
	Agreement 10-6-15 Word" and attachment		
D186	Email with the subject	DOJ SDFL 0000212317-	
וועם	"Contract" and attachment	DOJ_SDFL_0000212317- DOJ_SDFL_0000212318	
D187	Email string with subject	CZ02884-CZ02887	
D10/	"Corrected Broker	CZ02004-CZ02007	
	Agreement 10-6-15 Word"		
	and attachments		
	and attachments		

D188	Email string with subject	DOJ_SDFL_0003106868-
	"Corrected Broker	DOJ_SDFL_0003106869
7.100	Agreement 10-6-15 Word"	DOX 00010 (000
D189	Email string with subject	DOJ_SDFL_0003106870-
	"Corrected Broker	DOJ_SDFL_0003106871
D100	Agreement 10-6-15 Word"	DOL ODEL 0000212222
D190	Email string with the	DOJ_SDFL_0000212323-
	subject "Contract" and attachment	DOJ_SDFL_0000212325
D191	Email string with subject	DOJ SDFL 0003106872-
D191	"Corrected Broker	DOJ_SDFL_0003106874
	Agreement 10-6-15 Word"	DO3_5D1L_0003100074
D192	Email string with the	DOJ SDFL 0000212466-
D1)2	subject "Contract" and	DOJ SDFL 0000212471
	attachment	500_5512_0000212171
D193	Email with subject	DOJ_SDFL_0003106875
	"Distributor contract"	
D194	Email string with subject	DOJ SDFL 0003106877
	"Distributor contract"	
D195	Email string with the	DOJ_SDFL_0003106878-
	subject "Delta Tactical –	DOJ_SDFL_0003106896
	Panama -6.17.15" and	
	attachment	
D196	Email string with the	DOJ_SDFL_0003106897-
	subject "Delta Tactical –	DOJ_SDFL_0003106898
D107	Panama -6.17.15"	DOL CDEL 0002107000
D197	Email string with the	DOJ_SDFL_0003106899-
	subject "Delta Tactical – Panama -6.17.15"	DOJ_SDFL_0003106900
D198	Email with the subject "our	DOJ SDFL 0003106901-
D190	Distributor agreement"	DOJ_SDFL_0003106901- DOJ_SDFL_0003106902
D199	Email with subject "update	CZ01712-CZ01713
<b>D</b> 133	re status from James Kane"	C201/12 C201/13
D200	Email string with the	DOJ SDFL 0003106904-
	subject "update re status	DOJ SDFL 0003106905
	from James Kane"	
D201	Email string with the	DOJ_SDFL_0003106906-
	subject "Delta Tactical –	DOJ_SDFL_0003106907
	Panama -6.17.15"	
D202	Document with the subject	DOJ_SDFL_0000219957
	"Documenting Facts and	
	Circumstances surrounding	
<b>D</b> 200	the TASA contract"	DOLGDEN 0000107000
D203	Email string with the	DOJ_SDFL_0003106908-
	subject "Can you call me	DOJ_SDFL_0003106909
	for a couple quick	

	questions. James (404) 658- 5422"		
D204	Email with the subject "Kane email re Distributor Agreement 10-29-15" and attachment	DOJ_SDFL_0003106910- DOJ_SDFL_0003106924	
D205	Email string with the subject "Kane email re Distributor Agreement 10-29-15"	DOJ_SDFL_0003106925- DOJ_SDFL_0003106926	
D206	Email with the subject "ATLANCO redline draft Distributor Agreement from Kane 10-29-15" and attachments	CZ02888-CZ02914	
D207	Email string with the subject "International distributor agreement"	DOJ_SDFL_0003106930	
D208	Email with the subject "FC PA"	DOJ_SDFL_0003106931- DOJ_SDFL_0003106932	
D209	Email with the subject "Google policy manual I found" and attachments	CZ02915-CZ02968	
D210	Email with the subject "Atlanco-TPG Honduras Payment Waterfall - 8.14.15.xlsx" and attachment	DOJ_SDFL_0001838915- DOJ_SDFL_0001838916	
D211	Email string with the subject "ACTA DE TERCERA ENTREGA DE UNIFORMES FATIGA POLICIA NACIONAL HONDURAS"	DOJ_SDFL_0000214295- DOJ_SDFL_0000214296	
D212	Email string with the subject "ACTA DE TERCERA ENTREGA DE UNIFORMES FATIGA POLICIA NACIONAL HONDURAS"	DOJ_SDFL_0000214293- DOJ_SDFL_0000214294	
D213	Email with the subject "HNP Contract"	DOJ_SDFL_0000054419	
D214	Email string with the subject "HNP Contract"	DOJ_SDFL_0000214299- DOJ_SDFL_0000214300	
D215	Email string with the subject "HNP Contract"	DOJ_SDFL_0000214391- DOJ_SDFL_0000214393	

D216	Email string with the subject "HNP Contract" and	CZ02969-CZ02975	
	attachments		
D217	Email with the subject	DOJ SDFL 0000051996-	
	"TASA/Honduras/Contacts"	DOJ SDFL 0000051997	
	and attachment		
D218	Email string with the	CZ01832-CZ01836	
	subject "Factura para		
	tramite de pago"		
D219	Email string with the	DOJ SDFL 0003106990	
	subject "Atlanco – Catch		
	up"		
D220	Email with the subject	CZ02976-CZ03029	
	"FCPA policy manual I		
	found" and attachments		
D221	Email string with the	DOJ SDFL 0000407729	
	subject "HNP"		
D222	Email string with the	DOJ SDFL 0000407711	
	subject "HNP"		
D223	Email with the subject	DOJ SDFL 0000404553	
	"HNP p/u Boots and SF		
	belts"		
D224	Email string with the	DOJ SDFL 0003107044-	
	subject "HNP Contract"	DOJ_SDFL_0003107045	
D225	Email with the subject	DOJ SDFL 0003107046-	
	"HNP - Confirming our	DOJ_SDFL_0003107047	
	understanding"		
D226	Email string with the	CZ01932-CZ01934	
	subject "HNP - Confirming		
	our understanding"		
D227	Email string with the	DOJ SDFL 0000053225	
	subject "Letter dated		
	January 28, 2016"		
D228	Correspondence from	DOJ SDFL 0000051948	
	Atlanco		
D229	Email string with the	DOJ SDFL 0000212620	
	subject "Issues with		
	Account"		
D230	Email string with the	DOJ_SDFL_0000212610	
	subject "Issues with		
	Account"		
D231	Email string with the	DOJ_SDFL_0000212351	
	subject "Issues with		
	Account"		

			<u> </u>
D232	Email string with the subject "Video Call Wire Confirmation"	DOJ_SDFL_0001837201	
D222		DOL CDEL 0001027107	
D233	Email string with the subject "Video Call Wire	DOJ_SDFL_0001837197	
	Confirmation"		
D234	Text string	DOJ SDFL 0003107066-	
	S	DOJ SDFL 0003107090	
D235	Email with the subject	CZ02015	
2200	"HNP Contract"	3202010	
D236	Email string with the	CZ02016-CZ02017	
D230	subject "HNP Contract"	CZ02010-CZ02017	
D237	Email string with the	DOJ SDFL 0003107050-	
D237		DOJ_SDFL_0003107050- DOJ_SDFL_0003107051	
D220	subject "HNP Contract"		
D238	Email string with the	CZ02022-CZ02025	
D 2 2 2	subject "HNP Contract"	GE00010 GE00001	
D239	Email string with the	CZ02018-CZ02021	
	subject "HNP Contract"		
D240	Email string with the	CZ02026-CZ02042	
	subject "Borrador de		
	Contrato definitivo" and		
	attachment		
D241	Email string with the	CZ02043-CZ02059	
	subject "Borrador de		
	Contrato definitivo" and		
	attachment		
D242	Email string with subject	CZ03030-CZ03049	
	"HNP Contract"		
D243	Email string with subject	CZ02072-CZ02075	
	"HNP Contract"		
D244	Email string with subject	CZ02076-CZ02078	
	"HNP Contract"		
D245	Email string with the	CZ02091-CZ02093	
	subject "Borrador de		
	Contrato definitive"		
D246	Email string with the	CZ02094-CZ02097	
10210	subject "Borrador de		
	Contrato definitive"		
D247	Email string with the	CZ02112-CZ02118	
D24/	subject "Borrador de	CZ02112-CZ02110	
D240	Contrato definitive"	C702120 C702145	
D248	Email string with the	CZ02139-CZ02145	
	subject "Borrador de		
	Contrato definitive"		

D249	Email string with the subject "CONTRATO UNIFORMES"	CZ02153-CZ02155	
D250	Email string with the subject "CONTRATO UNIFORMES"	CZ02159-CZ02162	
D251	Email string with the subject "CONTRATO UNIFORMES"	CZ02163-CZ02167	
D252	Email string with the subject "Bond timing"	CZ02199-CZ02202	
D253	Email string with the subject "Bond timing"	CZ02195-CZ02198	
D254	Email string with the subject "CONTRATO UNIFORMES" and attachments	CZ03050-CZ03083	
D255	Email string with the subject "CONTRATO UNIFORMES"	CZ02244-CZ02246	
D256	Email string with the subject "CONTRATO UNIFORMES" and attachment	CZ02251-CZ02270	
D257	Email with the subject "TASA/HNP"	CZ02289	
D258	Email string with the subject "Atlanco - Bond Issuance"	DOJ SDFL 0003107057	
D259	Email string with the subject "Atlanco - Bond Issuance"	DOJ SDFL 0003107059- DOJ SDFL 0003107060	
D260	Email string with the subject "Adquisición de uniformes Policía Nacional"	CZ02299	
D261	Email string with the subject "Adquisición de uniformes Policía Nacional"	CZ02300-CZ02301	
D262	Email string with the subject "Adquisición de uniformes Policía Nacional"	CZ02315- CZ02317	
D263	Email string with the subject "Fianzas o pólizas"	CZ02333-CZ02335	

D264	Email string with the subject "Atlanco - HNP"	CZ02336-CZ02339	
D265	Email string with the subject "Atlanco - HNP"	CZ02348-CZ02351	
D266	Email string with the subject "Atlanco - HNP"	CZ02361-CZ02365	
D267	Email string with the subject "Atlanco - HNP"	CZ02371-CZ02376	
D268	Email string with the subject "Atlanco - HNP"	CZ02377-CZ02382	
D269	Email string with the subject "Atlanco - HNP"	CZ02391-CZ02397	
D270	Email string with the subject "Bank WT information"	DOJ_SDFL_0000216552- DOJ_SDFL_0000216553	
D271	Email string with the subject "HNP/TASA Contract - Advance Bond"	CZ02409-CZ02410	
D272	Email string with the subject "HNP/TASA Contract - Advance Bond"	CZ02416-CZ02419	
D273	Email string with the subject "HNP/TASA Contract - Advance Bond"	CZ02461-CZ02463	
D274	Email string with the subject "TASA HNP contract"	DOJ SDFL 0003107061- DOJ SDFL 0003107064	
D275	Email with subject "Government programs"	DOJ_SDFL_0000053063	
D276	Email with the subject "TASA Shipments"	DOJ_SDFL_0000401471- DOJ_SDFL_0000401472	
D277	Email with the subject "TASA Shipments"	DOJ_SDFL_0000247393- DOJ_SDFL_0000247396	
D278	Email string with the subject "Revision 745pm 05162019.docx" and attachments	DOJ_SDFL_0000285984- DOJ_SDFL_0000285990	
D279	Email string with the subject "Revision 745pm 05162019.docx"	DOJ_SDFL_0000053563- DOJ_SDFL_0000053564	
D280	Email with the subject "Recap"	DOJ_SDFL_0000053581	
D281	Email string with the subject "Presentations for Honduras"	DOJ_SDFL_0000052946- DOJ_SDFL_0000052947	

D282	Email with the subject	DOI SDEL 0000214086	
D282	Email with the subject "Presentation of TRU-	DOJ_SDFL_0000214086	
	SPEC in Honduras"		
D283	Email with the subject	DOJ_SDFL_0000759150	
D263	"Presentation of TRU-	DOJ_SDI*L_0000759150	
	SPEC in Honduras"		
D284	Email string with subject	DOJ SDFL 0000410473-	
D204	"Letter of Introduction -	DOJ_SDFL_0000410475	
	Honduras"	Des_SDIE_0000110175	
D285	Email string with subject	DOJ SDFL 0000214199-	
	"Binders for Presentation in	DOJ SDFL 0000214201	
	Honduras" and attachments		
D286	Email string with subject	DOJ SDFL 0000733625-	
	"Request for final pricing	DOJ SDFL 0000733626	
	from HONDURAS"		
D287	Email string with subject	DOJ_SDFL_0000227774	
	"Request for final pricing		
	from HONDURAS"		
D288	Email string with subject	DOJ_SDFL_0000213140-	
	"Request for final pricing	DOJ_SDFL_0000213142	
	from HONDURAS"		
D289	Email string with subject	DOJ_SDFL_0000733263-	
	"Honduras Contract	DOJ_SDFL_0000733273	
	opportunity" and		
7.000	attachments		
D290	Email string with subject	DOJ_SDFL_0000482956-	
	"HONDURAS / HNP	DOJ_SDFL_0000482958	
D201	TASA" and attachments	DOL GDEL 0000757250	
D291	Email string with subject	DOJ_SDFL_0000757350-	
	"HONDURAS / HNP	DOJ_SDFL_0000757352	
D202	TASA" and attachments	DOI (DEL 000021200)	
D292	Email string with subject "Delegation of Honduras"	DOJ_SDFL_0000213096- DOJ_SDFL_0000213099	
D293	Email Email	DOJ_SDFL_0000213099  DOJ_SDFL_0000400933-	
D293	Eman	DOJ_SDFL_0000400933-	
D294	Email with the subject	DOJ_SDFL_000040093	
D274	"Honduras"	DO3_5D1 L_0000031730	
D295	Email string with the	DOJ SDFL 0000405263-	
	subject "HONDURAS /	DOJ_SDFL_0000405267	
	HNP TASA" and		
	attachments		
D296	Email string with the	DOJ SDFL 0000496519-	
= = 3	subject "HONDURAS /	DOJ SDFL 0000496520	
	HNP TASA" and		
	attachment		

D297	Email string with the subject "HONDURAS / HNP TASA" and	DOJ_SDFL_0000405261- DOJ_SDFL_0000405262	
	attachment		
D298	Email with the subject	DOJ_SDFL_0000052001-	
	"Honduras National Police	DOJ_SDFL_0000052002	
	Delegation/For Your		
	Information"		
D299	Email with the subject	DOJ_SDFL_0000748865-	
	"Atlanco/HNP"	DOJ_SDFL_0000748867	
D300	Reserved for cross-		
	examination/impeachment		
D301	Reserved for cross-		
	examination/impeachment		
D302	Reserved for cross-		
	examination/impeachment		
D303	Reserved for cross-		
	examination/impeachment		
D304	Reserved for cross-		
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D305	Reserved for cross-		
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D242	examination/impeachment		
D342	Reserved for cross-		
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D377	Reserved for cross-		
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D378	Reserved for cross-		
2370	examination/impeachment		
D379	Reserved for cross-		
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D380	Reserved for cross-		
<b>D</b> 300	examination/impeachment		
D381	Reserved for cross-		
D301	examination/impeachment		
D382	Reserved for cross-		
D362	examination/impeachment		
D383	Reserved for cross-		
D363	examination/impeachment		
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Respectfully submitted, this 22d day of August, 2025.

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<a href="mailto:aclake@glcfirm.com">aclake@glcfirm.com</a>

Counsel for Mr. Carl Zaglin

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically via CM/ECF on this 22d day of August, 2025.

Robert M. Perez, P.A. Counsel for Defendant Carl Zaglin 3162 Commodore Plaza, Suite 3E Coconut Grove, Florida 33133 (305) 598-8889 - Office E-mail: rperez@rmplawpa.com

S/Robert M. Perez..... ROBERT M. PEREZ Florida Bar Number: 477494

Counsel for Mr. Carl Zaglin